

Schedule B: Compliance Summary at Lawrence Technological University (MI)

	Environmental Regulation (i.e., CAA, RCRA, CWA...)	Issue or Concern Noted in Environmental Compliance Audit	Specific Regulatory Citation for Disclosed Violation		Number of Violations
			Federal Citation	State Citation	
1	CAA - NESHAP	No asbestos disposal records (Notice of Intent) on file for asbestos abatement project for (Engineering Building, Maintenance Office, and Science Building heating system)	40 CFR 61.150(d)	MAC, 1995 AACRS R 336.1942 (Rule 942)	1
2	CAA - NESHAP	Potential asbestos containing waste materials (i.e. floor tiles and mastic) are not being stored in accordance with the packaging and labeling requirements of the NESHAP Asbestos standard.	40 CFR 61.150(a) & (b)	MAC, 1995 AACRS R 336.1942 (Rule 942)	1
3	CWA	Wastewater from the tank in the environmental chamber is being discharged outside to the storm drain and may have a pH >10 units and contain high levels of salt.	40 CFR 122	R. 323.2106	1
4	CWA	Failure to test or obtain approval from the POTW to discharge waste to sink drains and the sanitary sewer.	40 CFR 403.5(a)	R. 323.2303	5
5	CWA	Failure to test the floor stripper wastewater prior to discharge to ensure compliance with the local sewer use ordinance.	40 CFR 403.5	R. 323.2303	1
6	CWA - SPCC	Approximately one (1)-80 gallon elevator hydraulic oil reservoir has the potential to discharge oil to a floor drain located in the vicinity of the reservoir yet no secondary containment is provided	40 CFR 112.7	N/A - No equivalent state regulation	1
7	CWA - SPCC	Failure to train oil handling employees in operation and maintenance of equipment to prevent discharges, discharge procedure protocols, applicable pollution control laws, rules, and regulations, general facility operations, and the contents of the campus-wide SPCC plan.	40 CFR 112.7(f)	N/A - No equivalent state regulation	1
8	CWA - SPCC	The campus maintains greater than 1,320 gallons of oil on campus in minimum 55 gallon capacity containers in a manner which could affect navigable waterways yet has failed to develop and implement a Spill Prevention, Control and Countermeasure (SPCC) Plan that includes all oil storage on-site.	40 CFR 112.3	N/A - No equivalent state regulation	1
9	CWA - SPCC	The campus maintains greater than 1,320 gallons of oil on campus in minimum 55 gallon capacity containers in a manner which could affect navigable waterways yet has failed to conduct and document the inspection of oil storage on-site.	40 CFR 112.7(e)	N/A - No equivalent state regulation	1
10	CWA - SPCC	The 250 gallon bulk container of waste grease is not provided with secondary containment and is in an area which may affect navigable waterways via stormwater drains < 5 feet away on campus.	40 CFR 112.12	N/A - No equivalent state regulation	1
11	EPCRA	Road salt, OSHA Hazardous Substances, are stored on campus in exceedance of the 10,000 lb TPQ but were not included on an annual Tier II report.	40 CFR 370.20 40 CFR 370.40 40 CFR 370.41 40 CFR 370.42 40 CFR 370.43 40 CFR 370.44 40 CFR 370.45	N/A - No equivalent state regulation	1

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12	EPCRA	Road salt, OSHA hazardous substances, above their threshold quantity yet has failed to submit the corresponding MSDS to the SERC, LEPC, and local fire department.	40 CFR 370.20 40 CFR 370.30 40 CFR 370.31 40 CFR 370.32 40 CFR 370.33	N/A - No equivalent state regulation	1
13	RCRA - Hazardous Waste	Potentially hazardous waste has not been properly classified as hazardous or non-hazardous prior to disposal.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302(1) R 299.9205(2)(a)	46
14	RCRA - Hazardous Waste §261, Subpart A	Containers of waste paint do not meet the definition of "empty" prior to being disposed in the general trash.	40 CFR 261.7	R299.9207	1
15	RCRA - Universal Waste	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	40 CFR 273.14(e)	R 299.9228 (4)(c) (iv)	21
16	RCRA - Universal Waste	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	40 CFR 273.13(d)(1)	R 299.9228 (4) (c) (ii)	20
17	RCRA - Universal Waste	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	40 CFR 273.15(c)	R 299.9228 (4)(a)	26
18	RCRA - Universal Waste	Universal waste batteries are not clearly labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."	40 CFR 273.14(a)	R 299.9228.(4)(a)	5
19	RCRA - Universal Waste	Personnel who handle or have the responsibility for managing universal wastes have not been informed of the proper handling and emergency procedures appropriate to the universal wastes generated on-site	40 CFR 273.16	R 299.9228(4)(a)	1
20	RCRA - Universal Waste	Leaking and/or damaged used lamps are not being cleaned up and broken contents placed in containers that are closed and structurally sound.	40 CFR 273.13(d)(2)	R 299.9228 (4) (c) (ii)	2
21	RCRA-Used Oil Management	Peer auditors observed improperly labeled container of used oil.	40 CFR 279.22	R 299.9810 (3)	10
22	TSCA - LBP	Failure to provide purchaser or lessee any records or reports available to the seller or lessor pertaining to lead-based paint and/or lead-based paint hazards in the target housing	40 CFR § 745.107(a)(4)	N/A - No equivalent state regulation	1
23	TSCA - LBP	Failure to retain a copy of the completed disclosure records for no less than three years from the commencement date of the lease or the completion date of the sale pursuant to 40 CFR § 745.113(c)(1)	40 CFR § 745.113(c)(1)	N/A - No equivalent state regulation	1

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24	TSCA - LBP	Failure to provide purchaser or lessee EPA-approved lead hazard information/pamphlet	40 CFR § 745.107(a)(1)	N/A - No equivalent state regulation	1
25	TSCA - LBP	Failure to disclose to purchaser or lessee the presence of any known lead-based paint and/or lead-based paint hazards in the target housing	40 CFR § 745.107(a)(2)	N/A - No equivalent state regulation	1
26	TSCA - LBP	Failure to include, as an attachment or within the contract to lease target housing, the Lead Warning Statement	40 CFR § 745.113(b)(1)	N/A - No equivalent state regulation	1
27	TSCA - LBP	Failure to include, as an attachment or within the contract to lease target housing, a statement by the lessor disclosing the presence of known lead-based paint and/or lead-based paint hazards or indicating no knowledge of the presence of lead-based paint and/or lead-based paint hazards	40 CFR § 745.113(b)(2)	N/A - No equivalent state regulation	1
28	TSCA - LBP	Failure to include, as an attachment or within a contract to lease target housing, a list of any records or reports available to the lessor that pertain to the presence of any known lead-based paint and/or lead-based paint hazards in the target housing or to indicate that no such records are available pursuant to 40 CFR § 745.113(b)(3)	40 CFR § 745.113(b)(3)	N/A - No equivalent state regulation	1
29	TSCA - LBP	Failure to include, as an attachment or within a contract to lease target housing, a statement by the lessee affirming receipt of the information required by 40 CFR §§ 745.113(b)(2) and (b)(3) and the lead hazard pamphlet required under 15 USC §2686 as specified in 40 CFR § 745.113(b)(4)	40 CFR § 745.113(b)(4)	N/A - No equivalent state regulation	1
30	TSCA - LBP	Failure to include, as an attachment or within a contract to lease target housing, the signatures of the lessors, agents and lessees certifying to the accuracy of their statements, as well as dates of said signatures, pursuant to 40 CFR § 745.113(b)(6)	40 CFR § 745.113(b)(6)	N/A - No equivalent state regulation	1